Exhibit 13

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

KEITH FISCHER, MICHAEL O'SULLIVAN, JOHN MOESER, LOUIS PIA, THOMAS BARDEN, CONSTANCE MANGAN, and CHARISE JONES, individually and on behalf of all others similarly situated,

Plaintiffs,

-against-

Case No.: 23-Civ-02848(GRB)(ARL)

GOVERNMENT EMPLOYEES INSURANCE COMPANY d/b/a GEICO,

Defendant.

December 13, 2024 9:31 a.m.

EXAMINATION BEFORE TRIAL of GERRY CASSAGNE, a
Non-Party Witness herein, taken by the
Plaintiffs, held via Zoom, pursuant to Subpoena,
taken before DANIELLE DEYOUNG, a Shorthand
Reporter and Notary Public in and for the State
of New York.

MAGNA LEGAL SERVICES (866) 624-6221



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1	G. CASSAGNE	1	G. CASSAGNE
2	Q Do the essential functions one	2	there meeting with them to go over things
3	through ten describe your job duties as a	3	that he could put into the business plan.
4	field supervisor?	4	Q What went into the business
5	A Yes.	5	plan?
6	Q I am going to ask you about	6	A I can't tell you. I wasn't
7	number eight, which reads:	7	privy to everything that goes into that
8	"Prepares business plans,	8	business plan.
9	staffing, projections and budgets,	9	Q Do you recall meeting with
10	requisitions, supplies and materials	10	your manager to discuss a business plan?
11	necessary for sufficient operation,	11	A Yes.
12	reviews, plans and budgets periodically	12	Q How many times?
13	to achieve cost reduction where	13	A Once yearly or a couple
14	possible."	14	times yearly we would have planned
15	Did I read that correctly?	15	meetings to go over different things
16	A Yes.	16	that, as a field supervisor, we would be
17	Q What does business plans refer	17	able to help and say this is what's going
18	to, if you know?	18	on and whether it's staffing or cases or
19	A As a field supervisor I did	19	whatever. That's the input that we had.
20	not prepare business plans, requisitions.	20	Q Do you remember any other
21	We met with our manager to come up with a	21	conversations that you had at any of
22	business plan usually on a yearly basis,	22	those other meetings?
23	but the business plan was written by the	23	A They were a long time ago.
24	manager and prepared by the manager and	24	There was like, again, yearly meetings,
25	sent in by the manager. We just were	25	so lots of conversations.
	sent in by the manager. We just were		so lots of conversations.
	Page 28		Page 29
1	Page 28 G. CASSAGNE	1	Page 29 G. CASSAGNE
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2	G. CASSAGNE Q Do you remember any conversations that you had with your	2	G. CASSAGNE Q So of the planning meetings that you recall attending during that
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	Page 38		Page 39
1	G. CASSAGNE	1	G. CASSAGNE
2	A Yes.	2	month to benefit the associate"
3	Q Does this document reflect	3	"Meet monthly case review and"
4	what you understood to be GEICO's	4	
5	expectations of you as an SIU supervisor?	5	I believe it was us monitoring
6	A Yes.	6	the cases to make sure they were spread
7	Q I would like to direct you to	7	evenly throughout the month to the
8	2E towards the bottom of page one, Case	8	associates.
9	Reviews. You gave some testimony today	9	Q Does that mean that the cases
10	already about reviewing cases and my	10	were assigned in a staggered fashion to
11	question is	11	investigators?
12	Well, first off, I will read	12	MR. TSONIS: Objection,
13	it for the record. It says:	13	foundation, calls for speculation.
14	"Case Reviews: Meet monthly	14	It's the language.
15	case review and SPR expectations spread	15	BY MS. COLE-CHU:
16	evenly throughout the month to benefit	16	Q If you understand, Gerry, you
17	the associates."	17	can go ahead and answer.
18	Did I read that correctly?	18	A Cases were assigned to
19	A Yes.	19	investigators in a rotation basis, but
20	Q What does it mean to "meet	20	they were assigned specifically regarding
21	monthly case review and SPR	21	the cases they were assigned to or the
22	expectations"?	22	team they were assigned to. So some
23	A I believe this was us	23	investigators would get a certain amount
24	reviewing cases	24	of cases, regarding the team they were
25	"Spread evenly throughout the	25	in, and other investigators would get
	Page 40		Page 41
1	-	1	_
1 2	G. CASSAGNE	1 2	G. CASSAGNE
2	-	2	G. CASSAGNE foundation, calls for speculation.
	G. CASSAGNE other cases, regarding the team they were in.		G. CASSAGNE
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		1	
	Page 50		Page 51
1	G. CASSAGNE	1	G. CASSAGNE
2	Q How often was it needed, in	2	A Either by phone or by
3	your recollection?	3	however I needed to. Meetings.
4	A After my review of what the	4	Q How often did you have
5	investigator had or if the investigator	5	meetings?
6	needed an emergency, I would be on a	6	A I tried to have weekly
7	case-by-case basis.	7	meetings or if not, then I would have
8	Q Was it a frequent occurrence?	8	them when necessary.
9	MR. TSONIS: Objection to form.	9	MR. TSONIS: Off the record.
10	You can answer.	10	(Whereupon, a recess took
11	A No.	11	place at 10:30 a.m. and
12	Q If you were dealing with one	12	ended at 10:41 a.m.)
13	of these situations that we are	13	BY MS. COLE-CHU:
14	discussing now, otherwise the case	14	Q Gerry, before the break we
15	assignments strike that.	15	were talking about meetings that you had
16	How often did you communicate	16	with your investigators, and I believe
17	with your investigators that you	17	you testified that you tried to have
18	supervised?	18	meetings weekly. Why was it important to
19	A Sometimes daily, sometimes	19	meet weekly with your investigators?
20	weekly, depending on the need.	20	A To update them on any new
21	Q Did you regularly communicate	21	procedures, update them on any new types
22	with investigators?	22	of cases that may be coming out, update
23	A Yes.	23 24	them on any type of new fraud trends that
24 25	Q How did you communicate with them?	25	we had, stuff like that. O What does fraud trends mean?
23	mem?	23	Q What does fraud trends mean?
		_	
	Page 52		Page 53
1		1	
1 2	G. CASSAGNE	1 2	G. CASSAGNE
1 2 3	G. CASSAGNE A If we identified any type of	1 2 3	
2	G. CASSAGNE A If we identified any type of new fraudulent type of case, you know, if	2	G. CASSAGNE hardworking? A Yes.
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2 3 4 5	G. CASSAGNE A If we identified any type of new fraudulent type of case, you know, if the bad guys are doing something with	2 3 4 5	G. CASSAGNE hardworking? A Yes. Q And reliable? A Yes. Q Would you consider them
2 3 4 5	G. CASSAGNE A If we identified any type of new fraudulent type of case, you know, if the bad guys are doing something with staging accidents or doing something with body shop fraud or something like that.	2 3 4 5 6	G. CASSAGNE hardworking? A Yes. Q And reliable? A Yes. Q Would you consider them trustworthy investigators? A Yes.
2 3 4 5 6 7 8 9	G. CASSAGNE A If we identified any type of new fraudulent type of case, you know, if the bad guys are doing something with staging accidents or doing something with body shop fraud or something like that. So we try to keep them updated on all	2 3 4 5 6 7 8 9	G. CASSAGNE hardworking? A Yes. Q And reliable? A Yes. Q Would you consider them trustworthy investigators?
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		T	
	Page 90		Page 91
1	G. CASSAGNE	1	G. CASSAGNE
2	Q Immediately underneath	2	BY MS. COLE-CHU:
3	"Fraud," just to confirm, that refers to	3	Q Before you look at that,
4	productivity?	4	Gerry, I actually just have one question
5	A Yes.	5	on the last document. I didn't ask you
6	Q And audits refer to the audits	6	this.
7	we've been discussing, three a month that	7	Exhibit 6, the document we
8	you had to perform?	8	were just talking about, is that your
9	A Yes.	9	2019 performance evaluation?
10	Q And in this review, was your	10	A Yes.
11	investigators performance weighted in	11	Q Okay. Thank you.
12	your performance again like in prior	12	Now go ahead and look at the
13	years?	13	new document and let me know when you are
14	A Yes.	14	ready for me to ask you some questions
15	Q So like in prior years, your	15	about it.
16	job performance was determined by your	16	A Got it. Thank you.
17	investigators performance?	17	Q Again, this is Exhibit 7,
18	A Yes.	18	G010623.
19	MS. COLE-CHU: Okay.	19	Gerry, is this your 2020
20	Next is Exhibit 7. That	20	performance appraisal?
21 22	should be appearing in the chat. This is G010623.	21 22	A Yes.
23	(Whereupon, Exhibit 7 was	23	Q Who completed this appraisal? A Bill Newport.
23	marked for	24	. *
25	identification.)	25	Q I am going to ask you a few questions about this paragraph on the
23	identification.)	25	questions about this paragraph on the
	Page 92		Page 93
1	G. CASSAGNE	1	G. CASSAGNE
2			
	first page. Do you want a second to	2	Gerry.
	first page. Do you want a second to review it or are you ready for me to ask	2 3	Gerry. A Yes.
3	review it or are you ready for me to ask	2 3 4	A Yes.
3	review it or are you ready for me to ask you some questions about it?	3	A Yes. Q Can you tell me about that
3 4	review it or are you ready for me to ask you some questions about it?	3 4	A Yes. Q Can you tell me about that increase in workload, whatever you
3 4 5	review it or are you ready for me to ask you some questions about it? A Just give me a second to read	3 4 5	A Yes. Q Can you tell me about that
3 4 5	review it or are you ready for me to ask you some questions about it? A Just give me a second to read it.	3 4 5 6	A Yes. Q Can you tell me about that increase in workload, whatever you remember about it, when did it happen?
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	Page 186		Page 187
1	G. CASSAGNE	1	G. CASSAGNE
2	foundation, calls for speculation.	2	business need which was needed to be
3	You can answer.	3	done within the guidelines of the
4	A It could be any, but this is	4	company, then it would be approved
5	also for AD, which is the auto damage	5	because it had to be done to handle
6	people. So this is for both this is	6	either the investigation or the case
7	for a couple of different units. So this	7	correctly, to make sure things were done
8	is not specific to SIU.	8	according to protocols.
9		9	
10		10	Q Is it true, then, that if there was not a business need, overtime
11	you're not sure who "management" refers to?	11	was not available?
12		12	
13	MR. TSONIS: Objection, form,	13	MR. TSONIS: Objection to form. You can answer.
14	mischaracterizes testimony.	14	
	A Management, I believe, would	15	A No. Overtime was available if
15 16	be supervisors and managers and above.	16	the investigator explained to me why he
17	Q Looking down farther under the	17	needed to do it on that specific case, it
18	FAQ, the third bullet point, and the sub	18	would be approved.
19	point underneath that specifically reads:	19	Q Did you have discretion to
20	"Overtime has always been	20	approve overtime however you saw fit as a
21	available based on business need." What	21	supervisor?
22	do you understand business need to mean here?	22	A I did not have the ability to
23	A If you need to do something	23	say like those ten hours a week thing,
24	regarding your case or in this case, I	24	it was preapproved ten hours a week per investigator. I was able to tell my
25	would assume AD do something, that was a	25	investigators that if you are working on
25	would assume AD do something, that was a	25	investigators that if you are working on
	Page 188		Page 189
1	Page 188 G. CASSAGNE	1	Page 189 G. CASSAGNE
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	G. CASSAGNE a case and you run over your time and you deem it necessary, you would just have to	2 3	G. CASSAGNE
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1 G. CASSAGNE 2 to work overtime and they went ahead and 3 worked it, then that would become a 4 disciplinary action situation, and then 5 you would have to pay them for that work 6 time that they did and then deal with the 6 disciplinary action after that. 8 Q. What was the disciplinary 9 action, if you know? 10 A. I don't know. I've never had 11 to deal with it. 12 Q. Let's go back to Exhibit 23; 13 that was the Love I've and transcript. 14 transcript. 15 A. Okay. Go ahead. 16 Q. Are you familiar with Siccum? 17 A. Yes. 18 Q. Do supervisors use Siccum when 19 managing caseload for investigators they 20 supervise? 21 A. Siccum was the case management 22 system reporting system. 22 you were supervising your investigators? 24 you were able to see any of 25 A. Yes. 26 Q. And is that the timestamp 18 A. Siccum was the case management 29 supervise? 20 Did you use Siccum to when 21 Q. Does Siccum regard the point 22 you were supervising your investigators? 23 A. Yes. 24 Q. Does Siccum regard the point 25 A. Yes. 26 Q. I'w sa some cases had higher 27 A. Yes. 28 Q. Does Siccum regard the point 29 values shan others? 20 Did you use Siccum to when 21 Q. Does Siccum regard the point 22 you were supervising your investigators? 24 Q. Does Siccum regard the point 25 values? 26 A. I's based on the level at 27 closing. So if it was a — like we said, 28 it was a level one, long of a rine was a level one, long of the supervisors and the 29 investigator of the ability to change 29 that the values are like we said, 29 in the supervisor could do that. 37 A policy the supervisor of the ability to change 37 A Yes. 38 A Yes. 49 Q. Does Siccum regard the point 39 A Yes. 40 Q. Does Siccum regard the point 40 Values are when let live supervisors and the 41 investigator of the ability to change 42 A Yes. 40 Q. So if it was a — like we said, 41 invest a level one, you got one point for 42 ii. You got a level two because there 43 A. Yes. 44 C. Cassach and the supervisor could do that. 45 A. Yes. 46 Q. Doles Siccum record the date 47 C. Cas		Page 234		Page 235
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	Page 238		Page 239
1		1	
1	G. CASSAGNE	1	G. CASSAGNE
2	Q Does Siccum record the date	2	closed, does that field have a name?
3	and time a case was closed?	3	A It would just say case it
4	A Yes.	4	would just say report submitted, you
5	Q Is that the other end of the	5	would open up the report, read the
6	case life metric? Is that the timestamp	6	report, then I would hit approve. Then
7	that's used to measure case life?	7	when you went back in, in the line where
8	A Yes.	8	it said submitted, it would now say
9	Q And after an investigator	9	closed. Does that answer your question?
10	closes a case, what does that look like	10	Q I'm wondering if it's like
11	in Siccum? How do you know a case is	11	under like are those drop-down options
12	closed?	12	or I'm wondering
13	A It just says the report was	13	A When a supervisor approves it,
14	submitted and then you would have to go	14	he hits an approval button and then that
15	in, read the case, and then make sure	15	turns it into a if it's closed. Now
16	that it was closed right. Then once I	16	if it's a pending case, where it's not
17	approved it, it would show up as closed.	17	closed but he's just sending in the
18	There was some levels of cases	18	report that needs to be sent in during
19	that were automatically closed out	19	that timeframe, you know, entering a
20	supervisor approval. That was done on	20	report
21	some of the lower level cases, they were	21	Let's say he's just updating a
22	closed automatically; that was just a	22	report, it would still say report
23	system set up.	23	submitted. Then I would see it and then
24	Q Does that field that we are	24	once I hit approve, it would not
25	talking about that says submitted or	25	automatically go to closing, there was a
			, 5
		+	
	Page 240		Page 241
1	Page 240 G. CASSAGNE	1	Page 241 G. CASSAGNE
1 2		1 2	G. CASSAGNE
2	G. CASSAGNE		G. CASSAGNE or whether it would say report
	G. CASSAGNE check box that had to be checked to say closed and once that check box was	2	G. CASSAGNE or whether it would say report submitted, it would say closed, that was
2 3	G. CASSAGNE check box that had to be checked to say closed and once that check box was closed, then that made the case closed.	2 3	G. CASSAGNE or whether it would say report submitted, it would say closed, that was really the only status that it showed at
2 3 4	G. CASSAGNE check box that had to be checked to say closed and once that check box was closed, then that made the case closed. But entering reports stayed as open.	2 3 4	G. CASSAGNE or whether it would say report submitted, it would say closed, that was
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2 3 4 5 6	G. CASSAGNE check box that had to be checked to say closed and once that check box was closed, then that made the case closed. But entering reports stayed as open. Q When you're looking if you recall, I know it's been a few years.	2 3 4 5 6	G. CASSAGNE or whether it would say report submitted, it would say closed, that was really the only status that it showed at that point. Q So we've talked over the course of the whole day about
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1 G. CASSAGNE 2 CERTIFICATE 3 I, DANIELLE DeYOUNG, a Shorthand Reporter and Notary Public of the State of New York, do hereby certify: 7 That the WITNESS whose examination is hereinbefore set forth, was duly sworn, and that such examination is a true record of the testimony given by such WITNESS. 11 I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter. 15 16 17 18 19 20 DANIELLE DeYOUNG 21 22 23 24 25
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